

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

BAY STATE GAS,  
d/b/a Columbia Gas of Massachusetts

Defendant.


Criminal No. 20cr10064

**JOINT MOTION FOR RULE 11 CHANGE OF PLEA HEARING**

The United States and the defendant, through counsel of record, jointly move this Court to schedule, at the Court's earliest convenience, a change of plea hearing pursuant to Rule 11 of the Federal Rules of Criminal Procedure. The defendant intends to plead guilty to the offense charged in the Criminal Information filed in the case pursuant to the attached Plea Agreement.

Undersigned counsel has conferred with counsel for defendant who assents to and, joins in, this motion.

ANDREW E. LELLING  
UNITED STATES ATTORNEY

By:  Neil J. Gallagher, Jr.  
Evan Gotlob  
Assistant United States Attorneys

FOR BAY STATE GAS, d/b/a Columbia  
Gas of Massachusetts

By: /s/ Alejandro Mayorkas  
Alejandro N. Mayorkas, Esq.  
WilmerHale, LLP  
Counsel for Bay State Gas, d/b/a Columbia  
Gas of Massachusetts

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

/s/ Neil Gallagher

Neil J. Gallagher, Jr.

Assistant United States Attorney

Date: February 26, 2020